

PHILLIP A. TALBERT  
Acting United States Attorney  
DAVID W. SPENCER  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

JOSE GUADALUPE LOPEZ-ZAMORA,  
LEONARDO FLORES BELTRAN,  
CHRISTIAN ANTHONY ROMERO,  
JASON LAMAR LEE,  
BAUDELIO VIZCARRA, JR.,  
JOAQUIN ALBERTO SOTELO VALDEZ,  
RUDI JEAN CARLOS FLORES,  
ERIKA GABRIELA ZAMORA ROJO,  
ALEJANDRO TELLO,  
JAVIER HERNANDEZ,  
MATEO ELIAS GUERRERO-GONZALES,  
and  
JOSE LUIS AGUILAR SAUCEDO,  
  
Defendants.

CASE NO. 2:21-CR-0007-MCE

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
[PROPOSED] FINDINGS AND ORDER

DATE: August 26, 2021  
TIME: 10:00 a.m.  
COURT: Hon. Morrison C. England, Jr.

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and the above-captioned defendants, by and through their respective counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on August 26, 2021.

2. By this stipulation, defendants now move to continue the status conference until December 9, 2021, and to exclude time between August 26, 2021, and December 9, 2021, under Local Codes T2 and T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The grand jury returned an indictment in this case on January 28, 2021. Fourteen defendants are named in the publicly filed indictment. The names of two additional defendants who have not yet been arrested are redacted from the publicly filed indictment.

b) On February 24, 2021, defendant Mateo Guerrero-Gonzales made his initial appearance in the case and was arraigned on the Indictment. ECF No. 111.

c) On March 5, 2021, defendant Javier Hernandez made his initial appearance in the case and was arraigned on the Indictment. ECF No. 123.

d) On April 13, 2021, defendant Baudelio Vizcarra, Jr. made his initial appearance in the case and was arraigned on the Indictment. ECF No. 137. On May 4, 2021, the Court signed an order substituting attorney Sanjay Sobti as counsel of record for defendant Vizcarra. ECF No. 160.

e) On April 29, 2021, defendant Christopher Williams made his initial appearance in the case and was arraigned on the Indictment. ECF No. 153.

f) On May 11, 2021, the Court signed an order substituting attorney Kresta Daly as counsel of record for defendant Christian Romero. ECF No. 162.

g) The government has represented that the discovery associated with this case to date includes approximately 7,720 pages of materials, including investigative reports, photographs, search warrant materials, and other documents, as well as voluminous audio and video recordings and approximately 978 recorded phone calls intercepted pursuant to the Title III wiretap in this case. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

h) Counsel for defendants need additional time to review the voluminous discovery in this case, to conduct independent factual investigation, to research trial and sentencing issues, to consult with their clients, and to otherwise prepare for trial.

1 i) Counsel for defendants believe that failure to grant the above-requested  
2 continuance would deny them the reasonable time necessary for effective preparation, taking into  
3 account the exercise of due diligence.

4 j) The government does not object to the continuance.

5 k) In addition, this case is “complex” within the meaning of 18 U.S.C.  
6 § 3161(h)(7)(A), B(ii) [Local Code T2], as this Court previously found in its February 10, 2021  
7 Order (ECF No. 103) and subsequent orders.

8 l) Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendant in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11 m) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 et seq., within which trial must commence, the time period of August 26, 2021 to December 9,  
13 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
14 T4] and 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T2] because it results from a continuance  
15 granted by the Court at defendant’s request on the basis of the Court’s finding that the ends of  
16 justice served by taking such action outweigh the best interest of the public and the defendant in  
17 a speedy trial.

18 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
19 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
20 must commence.

21 IT IS SO STIPULATED.

1 Dated: August 20, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

2  
3 /s/ DAVID W. SPENCER  
DAVID W. SPENCER  
Assistant United States Attorney

4  
5 Dated: August 20, 2021

/s/ Todd D. Leras  
Todd D. Leras  
Counsel for Defendant  
JOSE GUADALUPE LOPEZ-  
ZAMORA

6  
7  
8 Dated: August 20, 2021

/s/ Christopher R. Cosca  
Christopher R. Cosca  
Counsel for Defendant  
LEONARDO FLORES BELTRAN

9  
10  
11 Dated: August 20, 2021

/s/ Kresta N. Daly  
Kresta N. Daly  
Counsel for Defendant  
CHRISTIAN ANTHONY ROMERO

12  
13  
14 Dated: August 20, 2021

/s/ Olaf W. Hedberg  
Olaf W. Hedberg  
Counsel for Defendant  
JASON LAMAR LEE

15  
16  
17 Dated: August 20, 2021

/s/ Sanjay Sobti  
Sanjay Sobti  
Counsel for Defendant  
BAUDELIO VIZCARRA, JR.

18  
19  
20 Dated: August 20, 2021

/s/ Michael D. Long  
Michael D. Long  
Counsel for Defendant  
JOAQUIN ALBERTO SOTELO  
VALDEZ

21  
22  
23  
24 Dated: August 20, 2021

/s/ Tasha P. Chalfant  
Tasha P. Chalfant  
Counsel for Defendant  
RUDI JEAN CARLOS FLORES

1 Dated: August 20, 2021

/s/ Martin Tejeda  
Martin Tejeda  
Counsel for Defendant  
ERIKA GABRIELA ZAMORA ROJO

2  
3 Dated: August 20, 2021

/s/ Michael Jared Favero  
Michael Jared Favero  
Counsel for Defendant  
ALEJANDRO TELLO

4  
5  
6 Dated: August 20, 2021

/s/ Kelly Babineau  
Kelly Babineau  
Counsel for Defendant  
JAVIER HERNANDEZ

7  
8  
9 Dated: August 20, 2021

/s/ Eduardo Garnica  
Eduardo Garnica  
Counsel for Defendant  
MATEO ELIAS GUERRERO-  
GONZALES

10  
11  
12 Dated: August 20, 2021

/s/ Dina L. Santos  
Dina L. Santos  
Counsel for Defendant  
JOSE LUIS AGUILAR SAUCEDO

13  
14  
15  
16 **[PROPOSED] FINDINGS AND ORDER**

17 IT IS SO FOUND AND ORDERED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

18  
19  
20 THE HONORABLE MORRISON C. ENGLAND, JR.  
21 SENIOR UNITED STATES DISTRICT JUDGE  
22  
23  
24  
25  
26  
27  
28